

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

FILED  
CHARLOTTE, NC

DEC 05 2024

US DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 CHRISTINA ROBINSON )  
 )  
 )

DOCKET NO. 3:24-cr-251-MOC

**FACTUAL BASIS**

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. Between in or about September 2013 and in or about April 2023, Defendant Christina Robinson ("ROBINSON"), a resident of Indiana, engaged in a scheme to defraud a Charlotte, North Carolina company (the "victim company") by abusing her accounting position for the victim company to embezzle nearly \$1.2 million in victim company funds. As part of the scheme, ROBINSON caused fraudulent interstate wires to issue from the victim company's bank accounts.
2. Throughout the scheme, ROBINSON withdrew the embezzled funds in cash, some of which she deposited into a personal bank account used, at least in part, to pay for expenses, including more than \$330,000 in purchases, more than \$324,000 in credit card payments, more than \$80,000 in loan payments, more than \$40,000 in mortgage payments, and more than \$35,000 in car payments.


3. During the scheme, ROBINSON worked as a controller for the victim company and had access to certain victim company bank accounts, including the authorization to transfer funds.
4. Specifically, ROBINSON's accounting position gave her access to the victim company's Southern Michigan Bank & Trust ("SMBT") account x0706, a restricted cash account into which employee health insurance premiums were deposited monthly.
5. Over the course of the scheme, ROBINSON made dozens of interstate wire transfers with no legitimate business purpose from SMBT account x0706 into seldom-used victim company bank accounts at Wells Fargo and Flagstar banks.
6. After transferring the funds from SMBT account x0706, ROBINSON would personally withdraw funds from the Wells Fargo and Flagstar bank accounts in cash.
7. ROBINSON took advantage of a position of trust within the victim company to deceive management and others within the business regarding her illegitimate movement of funds. To conceal her scheme and allow it to continue undetected, ROBINSON made materially false and misleading accounting entries in the books and records of the victim company.
8. Because of ROBINSON's deceptive actions, her fraudulent activity went unnoticed at the victim company for years. Between 2013 and 2023, ROBINSON made more than a dozen fraudulent electronic transfers from SMBT account x 0706, totaling more than \$1.1 million.
9. From in or about September 2013 through in or about April 2023, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, ROBINSON, with the intent to defraud, did knowingly and intentionally devise a scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, and representations, and by concealment of material facts, and, for the purpose of executing such scheme and artifice to defraud, did cause to be transmitted by means of wire communications in interstate and foreign commerce writings and signals, in that, among other things, the defendant, did send and cause to be sent wire transfers of funds in interstate and foreign commerce between the victim company's account at SMBT to other victim company bank accounts at Wells Fargo and Flagstar.
10. Throughout the conspiracy, ROBINSON, as a controller for the victim company, abused a position of public or private trust, and used a special skill, in a manner that significantly facilitated the commission or concealment of the offense.

DENA J. KING  
UNITED STATES ATTORNEY

  
WILLIAM T. BOZIN  
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.

  
W. Kelly Johnson, Attorney for Defendant

DATED: 11/18/2024